

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**Public Interest Legal Foundation,**

**Plaintiff,**

**V.**

**Jocelyn Benson,**

**Defendant.**

**Electronic Registration Information  
Center, Inc.,**

**Movant.**

**Civil Action No.** \_\_\_\_\_

**NON-PARTY ELECTRONIC REGISTRATION INFORMATION CENTER, INC.'S  
MOTION TO QUASH SUBPOENA AND FOR PROTECTIVE ORDER  
AND TO TRANSFER THIS MOTION TO  
THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF MICHIGAN**

Pursuant to Rules 26 and 45 of the Federal Rules of Civil Procedure, non-party Electronic Registration Information Center, Inc. (“ERIC”) hereby moves for an order quashing—and for a protective order in ERIC’s favor regarding—a subpoena served on ERIC by Plaintiff Public Interest Legal Foundation (“PILF”) in connection with litigation pending in the United States District Court for the Western District of Michigan. ERIC also respectfully requests that this Court transfer this Motion to the United States District Court for the Western District of Michigan. The grounds for this Motion are fully set forth in the accompanying opening brief.

Dated: April 18, 2023

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